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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

CONSTANCE GEORGE,

Plaintiff,

v.

HOUSE OF HOPE RECOVERY;  
BRIDGES TO CHANGE, INC.;  
WASHINGTON COUNTY  
DEPARTMENT OF HOUSING  
SERVICES, and PATRICIA BARCROFT,

Defendants.

Case No. 3:15-cv-01277-SB

PLAINTIFF'S LAY WITNESS LIST

In accordance with this Court's Civil Trial Management Order (ECF 90) dated November 30, 2017, plaintiff, Constance George, identifies the following individuals as witnesses that she may call at trial:

**WITNESSES**

1.     Name:                   Constance George  
       Address:             16865 N.W. Avondale Drive,  
                              Beaverton, Oregon 97006  
       Occupation:         Not currently employed  
       Estimated Time:     2-3 hours  
       Subject Matter of Testimony:

Ms. George will testify about how she came to live at House of Hope. Ms. George will testify that defendants terminated her tenancy after she made complaints about defendants' race-related comment and defendants' policies that required her to attend religious meetings, among other issues. Ms. George will testify that she was evicted after requesting to be excused from one of defendants' meetings because she, an African-American, felt ill, while a similarly situated white resident was both excused from the meeting and not evicted. Ms. George will testify about her work history, and the economic and noneconomic damages she suffered because of defendants' discriminatory actions.

2.     Name:                   Sharon Davis  
       Address:             Unknown  
       Occupation:         Unknown  
       Estimated Time:     1 hour  
       Subject Matter of Testimony:

Ms. Davis will testify that she was Ms. George's roommate at House of Hope. Ms. Davis will testify that she was excused from attending the 12-step meeting when she called in sick on March 19, the same day that Ms. George was evicted. Ms. Davis will testify that her illness was not called into question and that she was not evicted.

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3. Name: Kelsey Richardson  
 Address: Unknown  
 Occupation: Unknown  
 Estimated Time: 1 hour  
 Subject Matter of Testimony:

Ms. Richardson will testify that she was the senior resident at House of Hope during Ms. George's tenancy. Ms. Richardson will testify that Ms. George was evicted by defendants for not attending a meeting because of illness while a similarly situated white resident was both excused and not evicted. Ms. Richardson will testify that she witnessed the interaction between defendants and Ms. George when she was told to leave. Ms. Richardson will testify that she told Ms. George's fiancé, James Matthews, that she didn't think it was right that Ms. George was being evicted.

4. Name: Nancy Ferry  
 Address: Unknown  
 Occupation: Unknown  
 Estimated Time: 1 hour  
 Subject Matter of Testimony:

Ms. Ferry will testify that she told Ms. George that she would not have to attend any religious meetings at House of Hope. Ms. Ferry will testify about conversations she had with Ms. George on March 13, 2013, in which Ms. George complained about (1) Ms. Barcroft's statements about race; (2) the lack of essential supplies in the house (e.g., toilet paper); (3) the requirement to attend defendants' religious meetings; and (4) being confined to the property for two weeks and the resulting difficulties in being able to actively seek employment. Ms. Ferry will testify about the conversation she had on March 19, 2013, with defendants, Autumn Ray and Ms. George regarding her complaints and the agreed-upon resolution of that discussion. Ms. Ferry will testify regarding conversations she had with Ms. George after her eviction regarding finding alternative housing.

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5. Name: Patricia Barcroft  
 Address: 3056 N.W. 160th Court  
 Beaverton, Oregon 97006  
 Occupation: House of Hope Director  
 Estimated Time: 2 hour  
 Subject Matter of Testimony:

Ms. Barcroft will testify that she is the director of House of Hope Recovery in 2013. Ms. Barcroft will testify that Ms. Ferry set up an interview for Ms. George with Ms. Barcroft on March 5, 2013; Ms. Barcroft will testify about that interview. Ms. Barcroft will testify that Ms. George moved into House of Hope on March 10, 2013. Ms. Barcroft will testify about Ms. George's compliance with House of Hope policies. Ms. Barcroft will testify about the conversation with Ms. Ferry, Ms. George, and Ms. Ray during the March 19, 2013, meeting about Ms. George's complaints and the agreed upon resolution of that meeting. Ms. Barcroft will testify that Ms. George asked to be excused from the 12-step meeting on March 19, 2013, because Ms. George was feeling ill and that she was not excused. Ms. Barcroft will testify that she confronted Ms. George on March 19, 2013 and notified Ms. George that she was to be evicted from her residence.

6. Name: Autumn Ray  
 Address: 3056 N.W. 160th Court  
 Beaverton, Oregon 97006  
 Occupation: Employee at House of Hope  
 Estimated Time: 1 hour  
 Subject Matter of Testimony:

Ms. Ray will testify that she was an employee of defendants during Ms. George's tenancy with defendants. Ms. Ray will testify that she was sick during much of the time of Ms. George's tenancy. Ms. Ray will testify about providing Ms. George with a copy of House of Hope's policies and her instructions to Ms. George. Ms. Ray will testify about Ms. George's compliance with House of Hope policies. Ms. Ray will testify that she was present at the March 19, 2013, morning meeting with defendants, Ms. Ferry, and Ms. George, and about the complaints Ms. George had raised to Ms. Ferry before that meeting and the agreed upon

resolution of that discussion. She will testify that Ms. George called her in the afternoon of March 19, 2013, asking to be excused from the 12-step meeting because she was feeling ill and that Ms. George was not excused. Ms. Ray will testify that she received a similar call from Ms. Davis and that Ms. Davis was excused.

7. Name: James Matthews  
 Address: 2131 Quince Street, Apt. 1  
 Forest Grove, Oregon, 97116  
 Occupation: Unknown  
 Estimated Time: 1 hour  
 Subject Matter of Testimony:

Mr. Matthews will testify that he is Ms. George's former fiancé, that he was engaged to her during her tenancy with defendants, and that he lived with her after her tenancy with defendants. Mr. Matthews will testify about Ms. George's mental state before her tenancy with defendants. Mr. Matthews will testify that he picked up Ms. George on the day she was evicted by defendants. Mr. Matthews will testify about Ms. George's mental state after being evicted by defendants, and state that it was one of the reasons for their breakup. Mr. Matthews will testify to Ms. George's attempts to find employment before and after her eviction.

8. Name: DeShawn George  
 Address: 16865 N.W. Avondale Drive,  
 Beaverton, Oregon 97006  
 Occupation: Unknown  
 Estimated Time: 1 hour  
 Subject Matter of Testimony:

Mr. George will testify that he is Ms. George's son and that she lived with him before and after her tenancy with defendants. Mr. George will testify about Ms. George's mental state before her tenancy with defendants compared to her mental state after being evicted by defendants. Mr. George will testify to Ms. George's attempts to find employment before and after her eviction, and about her economic and noneconomic damages.

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9. Name: Sally Wentz  
Address: Unknown  
Occupation: Unknown  
Estimated Time: 1 hour  
Subject Matter of Testimony:

Ms. Wentz will testify about Ms. George's therapy sessions after she was evicted by defendants. Ms. Wentz will testify about the Sequoia Medical Health Records.

Ms. George reserves the right to call other witnesses if relevant to testimony or evidence offered by defendants during their case.

DATED: February 28, 2018.

MILLER NASH GRAHAM & DUNN LLP

s/ Elisa J. Dozono

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Attorneys for Plaintiff

### **CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing plaintiff's lay witness list on:

Ms. Rebecca Cambreleng  
Cambreleng Law, LLC  
806 S.W. Broadway, Suite 1200  
Portland, Oregon 97205

Attorney for Defendants House of Hope Recovery  
and Patricia Barcroft

by the following indicated method or methods on the date set forth below:

- ☒ **CM/ECF system transmission.**
- ☐ **E-mail.** (Courtesy copy.)
- ☐ **E-mail.** As required by Local Rule 5-11, any interrogatories, requests for production, or requests for admission were e-mailed in Word or WordPerfect format, not in PDF, unless otherwise agreed to by the parties.
- ☐ **First-class mail, postage prepaid.**
- ☐ **Hand-delivery.**
- ☐ **Overnight courier, delivery prepaid.**

DATED: February 28, 2018.

s/ Elisa J. Dozono

Elisa J. Dozono, OSB No. 063150

Of Attorneys for Plaintiff